

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re:	§ § Chapter 7 § § Case No. 24-10806-smr § § Debtor
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**AGREED MOTION TO EXTEND DEADLINES TO FILE
A COMPLAINT PURSUANT TO 11 U.S.C. § 523 AND/OR 11 U.S.C. § 727**

UMB Bank, National Association, as indenture trustee (“UMB”), by and through its undersigned counsel, submits this agreed motion (the “**Motion**”) for entry of an order granting an extension of time to February 28, 2025 for UMB and U.S. Bank National Association, as collateral agent (“**U.S. Bank**”), to file a complaint (i) objecting to the discharge of John Andrew Goodman (the “**Debtor**”) pursuant to 11 U.S.C. § 727 and/or (ii) objecting to the dischargeability of debts owed to UMB and U.S. Bank pursuant to 11 U.S.C. § 523(c) pursuant to Federal Rules of Bankruptcy Procedure 4004(b), 4007, and 9006 and Local Rule 9014(d)(3), and respectfully states as follows:

1. The United States Bankruptcy Court for the Western District of Texas (this **Court**) has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b) and the Court may enter final orders and judgments on the claims raised herein. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409.

2. The statutory and legal predicates for the relief requested herein are section 105(a) of title 11 of the United States code (the “**Bankruptcy Code**”), rule 9006 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and rule 9014(d) of the Local Rules of the

United States Bankruptcy Court for the Western District of Texas (the “**Bankruptcy Local Rules**”).

3. On July 10, 2024, the Debtor filed this bankruptcy case under Chapter 7 of Bankruptcy Code. John Patrick Lowe (the “**Chapter 7 Trustee**”) was appointed to serve as trustee in the case and continues to serve in that capacity. The meeting of creditors under section 341 of the Bankruptcy Code (the “**341 Meeting**”) was held on August 15, 2024, and was continued to December 16, 2024. [Docket No. 122.]

4. The current deadline for filing complaints under sections 523(c) and 727 of the Bankruptcy Code is December 15, 2024. This motion is timely filed pursuant to Bankruptcy Rules 4004(b). Pursuant to Bankruptcy Rule 4004(c)(1)(E), the Court shall not grant the Debtor a discharge while this Motion is pending.

5. The Debtor has previously agreed to similar extensions with the United States Trustee, the Chapter 7 Trustee, and FedEx Supply Chain Logistics & Electronics, Inc. *See* Docket Nos. 138 and 143.

6. Under Bankruptcy Rules 4004(b)(1) and 9006(b)(3), the Court may grant an extension of time to file a complaint under sections 523 and 727 of the Bankruptcy Code. The Court may grant the Motion without a hearing under Bankruptcy Local Rule 9014(d).

7. On December 13, 2024, counsel for the Debtor informed the undersigned that the Debtor consented to the relief requested in the Motion.

8. Cause exists in this case to extend the deadline to file a complaint under sections 523 and 727 of the Bankruptcy.

WHEREFORE, UMB respectfully requests that the Court enter an order, substantially in the form attached hereto, extending the deadline for UMB and U.S. Bank to file a complaint under sections 523 and 727 of the Bankruptcy Code to February 28, 2025 and granting such other and further relief as may be just and proper.

Dated: December 13, 2024

Respectfully Submitted,

/s/ Philip M. Guffy

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Counsel to UMB Bank, National Association, as Indenture Trustee

CERTIFICATE OF CONFERENCE

I hereby certify that, on December 13, 2024, I conferred with counsel for the Debtor via email, and he informed me that the Debtor agrees to the relief requested in the Motion.

/s/ Philip M. Guffy _____
Philip M. Guffy

Agreed by:

/s/ Martin Seidler _____
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Counsel for the Debtor

CERTIFICATE OF SERVICE

I certify that on December 13, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Western District of Texas and.

/s/ Philip M. Guffy _____
Philip M. Guffy